<center>**Remarks**</center>

In response to the Office Action dated July 19, 2006, Applicants respectfully requests reconsideration based on the above claim amendment and the following remarks. Applicants respectfully submit that the claims as presented are in condition for allowance.

Claims 1-11, 16 and 32-34 strand rejected under 35 U.S.C. § 102(b) as being anticipated by Leong et al. (U.S. Patent No. 5,996,010, hereinafter "Leong"). Independent claims 1 and 32 have been amended. No new matter has been added.

Interview Summary

A brief telephonic interview between Applicants' representative Arno Naeckel (Registration No. 56,114) and the Examiner was held on October 12 to discuss independent claims 1 and 32 in view of the cited reference Leong. In the interview, a discussion was held with respect to the difference between a Network Management Server and a plurality of Network Management software objects residing on edge switches. It was further discussed that Leong did not disclose displaying in tabular form the identified network element fault information corresponding to the plurality of data entries over the previous finite time period. The Examiner would consider formal Amendments but indicated that at least the addition of the tabular display would probably be sufficient to overcome Leong.

102 Rejections

Claims 1-11, 16 and 32-34 are rejected as being anticipated by Leong under §102(b). The Applicants respectfully traverse the rejections.

Amended independent claims 1 and 32 specify a system and method for network element fault information processing. Amended claims 1 and 32 recite similar claim elements. As a representative sample, independent claim 1 recites, in pertinent part:

"[a] system for network element fault information processing...wherein the network element fault file contains network element fault information collected over a rolling time period, wherein the rolling time period comprises a previous finite time period wherein the previous finite time period is selected from the group consisting of a plurality of hours, a plurality of days, a week, and a month, and display in tabular form the identified network element fault information corresponding to the plurality of network element faults over the previous finite time period.

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It is respectfully submitted that Leong fails to teach each and every feature specified in amended independent claims 1 and 32. For example, Leong fails to teach that instructions to process network element fault information include instructions to summarize the identified network element fault information corresponding to a plurality of network element faults, the plurality of network element faults comprising transitions to down state, transitions to up state, frame errors and remainder network faults. Nor *does Leong teach presenting the fault information in table form*. Instead, Leong discloses the use of "GET" and "TRAP" instructions to allow a browser to display an instantaneous measurement or value of a certain network management parameter, identified by a Management Information Base ("MIB") object (e.g., a "GOOD FRAMES" object for indicating the number of uncorrupted frames being received at a network device). See column 14, lines 43-64. Leong, however, fails to teach instructions to summarize network element fault information which includes transitions to down state, transitions to up state, frame errors and remainder network faults as specified in amended independent claim 1. Leong does refer to the "graphic display of a monitored network parameter" in the sense the "data value may be incorporated into an HTML document" but *does not describe displaying in tabular form the identified network element fault information corresponding to the plurality of network element faults*.

Moreover, Leong also fails to teach that network element fault information is collected over a rolling time period, wherein the rolling time period comprises a previous finite time period wherein the previous finite time period is selected from the group consisting of a plurality of hours, a plurality of days, a week, and a month. Instead, Leong discloses periodically transmitting requests to an agent to provide a network manager viewing a browser with a continual update of a monitored parameter or "MIB" object. See Column 14, lines 43-64. Leong fails to teach a "rolling time period" because the disclosed method specifies that the requests for updates of a monitored parameter or MIB object are periodically transmitted. Thus, the use of "continuous" in Leong refers to the sending of repeated periodic requests for instantaneous measurements or values of network parameters (see Col. 14, lines 1-7 discussing that the transmission of numerous request messages involves numerous iterations of steps 208-212 in Fig. 14). Thus, while Leong describes sending numerous requests for instantaneous (i.e., immediate) network parameter values over a number of periods, amended independent claim 1 specifies collecting network element fault information over a single previous finite time period

selected from the group consisting of a plurality of hours, a plurality of days, a week, and a month and *displaying in tabular form the identified network element fault information corresponding to the plurality of network element faults over the previous finite time period*. As such, independent claim 1 is allowable over Leong for at least these reasons.

Further, in regards to amended independent claim 1, Leong fails to describe a network management server. Instead, Leong describes the use of multiple network management agents, (i.e. a software objects (Col. 6, l. 65 – Col. 7, l. 5)), that are installed on a network devices **32** to which a number of end devices **34** are coupled. (Col. 6, l. 15-16) (i.e. edge switches).

In its rejection on page 3, the Office Action appears to be equating a "network device **32** to which a number of end devices **34** are coupled" to an "edge switch which is a first point of access to the network for communication by a customer" as recited in claim 1. It therefore follows that Leong is describing a system of network management software agents installed on multiple edge switches which act as a server where clients send request messages to the network management agents, which in response propagate responses to the clients. (Col. 6, l. 29-32).

However, network management software objects disbursed and installed at multiple edge switches are not a centralized network management server. Multiple network management software objects disbursed at multiple edge switches, as described by Leong, are structurally different from a centralized network management server. As such, independent claim 1 is allowable over Leong for at least this additional reason.

Claims 2-11 and 16 depend from amended independent claim 1, and are thus allowable for at least the same reasons. Amended independent claim 32 recites similar features as amended independent claim 1 and thus is also allowable for at least the same reason. Claims 33-34 depend from amended independent claim 32, and are thus allowable for at least the same reasons. Therefore, the rejections of claims 2-11, 16, and 32-34 should also be allowed.

Conclusion

In view of the foregoing amendments and remarks, this application is now in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is invited to call the Applicants' attorney at the number listed below.

Respectfully submitted,

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